IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

Wade Harlan		
	Plaintiff,	No. 1:17-cv-07479
v. Multipoint, Inc.		Honorable Jeffrey T. Gilbert
	Defendant.	

REPORT OF PARTIES' PLANNING MEETING

1. **Meeting.** Pursuant to FED. R. CIV. P. 26(f), a meeting was held telephonically on January 12, 2018 and was attended by:

For the Plaintiff
Matthew A. Sidor
Sidor Law, Ltd.
20 S. Clark, Ste. 2301
Chicago, Illinois 60603

For the Defendant Bert Zaczek 311 N. Aberdeen, Suite 200-D Chicago, Illinois 60607

- 2. **Pre-trial Schedule.** Plaintiff proposes to the court the following discovery plan:
- a. Discovery may be needed with regard to the amount of money withheld and reasons for withholding the money. At this stage, the parties do not anticipate the need for expert discovery.
- b. Disclosures pursuant to FED. R. CIV. P. 26(a)(1) have been exchanged in the form of MIDP Responses. The initial phase of fact discovery shall be completed by 3/13/18. There are no retained experts anticipated.
- c. The parties expect they will need approximately 2-3 fact depositions. Depositions of representatives of plaintiff and defendants, as well as the managers/supervisor/office staff at the defendant corporation are anticipated. Depositions of accountants/bookkeepers may not be needed as the parties agree on the amounts at issue. All depositions shall be completed by 4/13/18.
 - d. There are no retained experts anticipated.
- e. All potentially dispositive motions should be filed by May 14, 2018.

- f. Final pretrial order: Plaintiff to prepare proposed draft by June 1, 2018; parties to file joint final pretrial order by June 8, 2018.
- g. The case should be ready for trial by June 29, 2018, and at this time is expected to take approximately 1/2 day.

DATE: January 8, 2018

Respectfully submitted,

/s/Matthew A. Sidor

One of the Plaintiff's Attorneys

Matthew A. Sidor Sidor Law, Ltd. 20 S. Clark, Ste. 2301 Chicago, Illinois 60603 Atty. No. 6278447

Prepared By: Matthew A. Sidor Sidor Law, Ltd. 20 S. Clark, Ste. 2301 Chicago, Illinois 60603 Atty. No. 6278447